

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**CHARLES CRANFIELD, THE
CONDOMINIUMS AT NORTHPOINTE
ASSOCIATION, and CHRISTINA
ERMIDIS**, for themselves individually and
on behalf of all others similarly situated,

Plaintiffs,
vs.

**STATE FARM FIRE & CASUALTY
COMPANY,**

Defendant.

CASE NO. 1:16-CV-01273

JUDGE CHRISTOPHER A. BOYKO

JOINT STATUS REPORT

Pursuant to the Court’s order of July 20, 2022, Plaintiffs and Defendant State Farm Fire and Casualty Company (collectively, the “Parties”) respectfully submit the following Joint Status Report:

1. On October 7, 2021, the Court granted the Parties’ joint motion to stay all deadlines in the case in order to engage a mediator to facilitate settlement discussions. Doc. 143.

2. The Parties have participated in several full-day mediation sessions with mediator Michael N. Ungar of Ulmer & Berne LLP and have reached an agreement in principle to settle the case on a class-wide basis.

3. Since the Parties’ last status report on July 18, 2022, the Parties have executed a term sheet memorializing their agreement in principle and have also exchanged an initial, working draft of the more comprehensive class settlement agreement (without exhibits) that is subject to revisions.

4. In light of the Parties’ ongoing efforts to finalize their agreement to settle this case on a class-wide basis, the Parties request that the stay of this case be continued and propose

deferring the next Joint Status Report for at least 60 days to advise of their progress in finalizing the settlement.

Dated: September 19, 2022

Respectfully submitted,

/s/ Karl A. Bekeny

Karl A. Bekeny (OH #0075332)
Benjamin C. Sasse (OH #0072856)
Elisabeth C. Arko (OH #0095895)
Tucker Ellis LLP
950 Main Avenue, Suite 1100
Cleveland, OH 44113-7213
Telephone: 216.592.5000
karl.bekeny@tuckerellis.com
benjamin.sasse@tuckerellis.com
elisabeth.arko@tuckerellis.com

Joseph A. Cancila, Jr. (IL #6193252)
Jacob L. Kahn (IL #6296867) (pro hac vice)
Brian Neff (NY # 4304648) (pro hac vice)
Allison N. Siebeneck (IL #6313603)
Riley Safer Holmes & Cancila LLP
70 W. Madison St., Suite 2900
Chicago, IL 60602
Telephone: 312.471.8700
jcancila@rshc-law.com
jkahn@rshc-law.com
bneff@rshc-law.com
asiebeneck@rshc-law.com

Counsel for Defendant State Farm Fire and Casualty Company

/s/ Erik D. Peterson (with consent)

Patrick J. Perotti, Esq. (#0005481)
James S. Timmerberg, Esq. (#0067499)
Dworken & Bernstein Co., L.P.A.
60 South Park Place
Painesville, Ohio 44077
Phone: (440) 352-3391
Fax: (440) 352-3469
Email: pperotti@dworkenlaw.com
jtimmerberg@dworkenlaw.com

James A. DeRoche, Esq. (#0055613)
Garson Johnson LLC
101 West Prospect Avenue, Suite #1610
Midland Building
Cleveland, OH 44115
Phone: (216) 830-1000
Fax: (216) 696-8558 Fax
Email: jderoche@garson.com

R. Eric Kennedy (#0006174)
Daniel P. Goetz (#0065549)
Weisman, Kennedy & Berris Co., L.P.A.
1600 Midland Building
101 Prospect Ave., W.
Cleveland, OH 44113
Phone: (216)781-1111
Fax: (216)781-6747
Email: ekennedy@weismanlaw.com
dgoetz@weismanlaw.com

Erik D. Peterson (pro hac vice)
Erik Peterson Law Offices, PSC
249 E. Main Street, Suite 150
Lexington, KY 40507
Tel: 800-614-1957
Email: erik@eplo.law

Counsel for Plaintiffs Charles Cranfield,

*The Condominiums at Northpointe
Association, and Christina Ermidis*

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent today (September 19, 2022) electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Karl A. Bekeny

Karl A. Bekeny (OH #0075332)
Tucker Ellis LLP

*One of the Attorneys for Defendant State
Farm Fire and Casualty Co.*